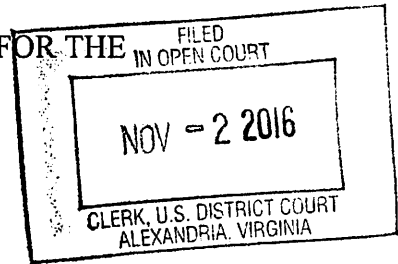


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MOHAMAD JAMAL KHWEIS,

Defendant.

)  
) Criminal No. 1:16-CR-143  
)  
) Count 1: 18 U.S.C. § 2339B  
) Conspiracy to Provide Material Support to ISIL  
)  
) Count 2: 18 U.S.C. § 2339B  
) Providing and Attempting to Provide  
) Material Support to ISIL  
)  
) Forfeiture

INDICTMENT

November 2016 Term – At Alexandria

THE GRAND JURY CHARGES THAT:

COUNT 1

CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO  
A FOREIGN TERRORIST ORGANIZATION

Beginning in at least December 2015, and continuing thereafter up to and including March 14, 2016, in an offense committed outside the jurisdiction of any particular State or district of the United States, the defendant MOHAMAD JAMAL KHWEIS, a United States citizen who last resided in Fairfax County, Virginia, and who was first brought to and found in the Eastern District of Virginia, did knowingly conspire with others to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the United States

Secretary of State as a foreign terrorist organization, knowing that ISIL was a designated foreign terrorist organization, that ISIL engages and has engaged in terrorist activity, and that ISIL engages and has engaged in terrorism.

(All in violation of Title 18, United States Code, Section 2339B.)

COUNT 2

PROVIDING AND ATTEMPTING TO PROVIDE MATERIAL SUPPORT TO  
A FOREIGN TERRORIST ORGANIZATION

Beginning in at least December 2015, and continuing thereafter up to and including March 14, 2016, in an offense committed outside the jurisdiction of any particular State or district of the United States, the defendant MOHAMAD JAMAL KHWEIS, a United States citizen who last resided in Fairfax County, Virginia, and who was first brought to and found in the Eastern District of Virginia, did knowingly provide, and attempt to provide, “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIL was a designated foreign terrorist organization, that ISIL engages and has engaged in terrorist activity, and that ISIL engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Section 2339B.)

FORFEITURE

THE GRAND JURY FINDS PROBABLE CAUSE THAT THE ASSETS  
DESCRIBED BELOW ARE SUBJECT TO FORFEITURE.

The United States hereby gives notice to the defendant MOHAMAD JAMAL KHWEIS that, upon his conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and (G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any property, real or personal, constituting or derived from proceeds traceable to said offenses; and (b) all assets, foreign or domestic: (i) of any individual, entity or organization engaged in planning or perpetrating any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign government, including but not limited to the following: (1) \$4,151.00 United States dollars; (2) three mobile phones; and (3) SIM/memory cards possessed by the defendant upon his seizure.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

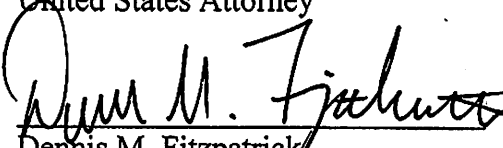
it is the intent of the United States, pursuant to Title 18, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.


(In accordance with Title 18, United States Code, Sections 981(a)(1)(C) and (G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c).)

A TRUE BILL  
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

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FOREPERSON OF THE GRAND JURY

Dana Boente  
United States Attorney  
By:   
Dennis M. Fitzpatrick  
Assistant United States Attorney

By:   
Raj Parekh  
Trial Attorney  
National Security Division  
U.S. Department of Justice